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5/18/98

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

(See Attached List of Addressees)

Re: Request for Information Pursuant to Section 104 of CERCLA
for Cornell-Dubilier Electronics, Inc. Site in Middlesex
County, New Jersey.

Dear Sir/Madam:

This letter seeks your cooperation in providing information and documents relating to the contamination of the Cornell-Dubilier Electronics, Inc. Superfund ("Site") in Middlesex County, New Jersey. The Site is located at 333 Hamilton Boulevard in South Plainfield, New Jersey and is also known as the Hamilton Industrial Park. A Superfund site is a site contaminated with high levels of hazardous substances that may present a threat to human health or the environment.

We encourage you to give this matter your immediate attention and request that you provide a complete and truthful response to this Information Request and attached questions within 30 days of your receipt of this letter.

The United States Environmental Protection Agency ("EPA") is investigating the release or threat of release of hazardous substances, pollutants, or contaminants at the Site. EPA is seeking to obtain information concerning the generation, storage, treatment, transportation, and disposal methods of such substances that have been or threaten to be released at the Site. EPA will study the effects of these substances on the environment and public health. In addition, EPA will identify activities, materials and parties that contributed to contamination at the Site. EPA believes that you might have information which may assist the Agency in its investigation of the Site.

Site Description

The Cornell-Dubilier Electronics, Inc. (CDEI) Site is located on Hamilton Boulevard, south of the Conrail railroad tracks, in South Plainfield, Middlesex County, New Jersey. The site is currently known as the Hamilton Industrial Park. Cornell-Dubilier Electronics, Inc. tested transformer oils at the approximately 25-acre property for an unknown period of time until the company vacated the site in approximately 1961. It was alleged that during CDEI's period of operation, the company disposed of transformer oil contaminated with polychlorinated biphenyls (PCBs) directly onto site soils. In addition, various tenants have operated at the Site from the 1960's to the present.

Environmental sampling conducted by the New Jersey Department of Environmental Protection (NJDEP) in 1986 and the EPA in 1994 confirmed the presence of elevated levels of hazardous substances, including volatile organic compounds (VOCs), semi-volatile organic compounds, PCB's and inorganic constituents in the site soils. In addition, PCBs were detected in the sediments of the unnamed tributary of the Bound Brook, which traverses the southeastern portion of the site property. As a result, the Site was proposed for listing on the National Priorities List (NPL) in September 1997.

EPA has undertaken various response actions at the Site designed to reduce the potential for exposure to contaminants on-site and limit the movement of contaminants off-site. Large areas of the Site were paved by the current owners of the Hamilton Industrial Park and a truck driving school was shut down in an effort to reduce dust. The Site was also fenced to restrict access and prevent the tracking of PCBs off-site and into the community. In addition, drainage controls were installed to limit the movement of contaminants to the nearby Bound Brook through surface water run-off.

Description of Legal Authority

The federal "Superfund" law (the Comprehensive Environmental Response, Compensation and Liability Act, as amended, 42 U.S.C. Section 9601, et seq., commonly referred to as "CERCLA" and "Superfund") gives EPA the authority to, among other things:

(1) assess contaminated sites, (2) determine the threats to human health and the environment posed by each site, and (3) clean up those sites.

Information Request

EPA has documented the release of hazardous substances at the Site. To determine the nature of the materials you may have generated, treated, stored, transported and/or disposed of, EPA requests that you answer fully the questions in the attached "Request for Information."

This "Request for Information" is part of a continuing investigation into the nature of the waste materials disposed of at the Cornell-Dubilier Electronics, Inc. Site. To facilitate the information gathering process, EPA requests that you respond in detail to all questions in the following attachment and that you furnish supporting documentation.

Under Section 104(e) of CERCLA, 42 U.S.C. Section 9604(e), EPA has broad information gathering authority which allows EPA to require persons to furnish information or documents relating to:

(A) The identification, nature, and quantity of materials which have been or are generated, treated, stored, or disposed of at a vessel or facility or transported to a vessel or facility.

(B) The nature or extent of a release or threatened release of a hazardous substance or pollutant or contaminant at or from a vessel or facility.

(C) The ability of a person to pay for or perform a cleanup.

While EPA seeks your cooperation in this investigation, compliance with the Information Request is required by law. Please note that false, fictitious, or fraudulent statements or representations may subject you to civil or criminal penalties under federal law.

Some of the information EPA is requesting may be considered by you to be confidential. Please be aware that you may not withhold the information upon that basis. If you wish EPA to

treat the information confidentially, you must advise EPA of that fact by following the procedures outlined in the instructions for responding to the request for information.

If you have information about other parties who may have information which may assist the Agency in its investigation of the Site or may be responsible for the contamination at the Site, that information should be submitted to EPA.

This Information Request is not subject to the approval requirements of the Paperwork Reduction Act of 1980, 44 U.S.C. Section 3501 et seq.

Instructions on how to answer the questions in this letter can be found in the enclosed attachments.

Your response to this Information Request should be mailed to:

Mr. Peter Mannino
Emergency and Remedial Response Division
U.S. Environmental Protection Agency, Region II
290 Broadway, 19th Floor
New York, New York 10007

A copy of your reply should also be sent to:

Mr. Muthu Sundram, Esq., Assistant Regional Counsel
Office of Regional Counsel
U.S. Environmental Protection Agency, Region II
290 Broadway, 17th floor
New York, New York 10007

If at any time in the future you have additional information and/or find that any aspect of the submitted information is false, misleading, or misrepresents the truth, you must notify EPA. Failure to amend the response may be construed as a concealment. If any part of the response is found to be knowingly untrue, the signatory and the responding entity may be subject to criminal prosecution.

If you have additional questions about the history of the Site, the nature of the environmental conditions at the Site, or the

status of cleanup activities, please contact Mr. Peter Mannino at (212) 637-4395. However, calls of a legal nature or requests from attorneys should be placed directly with Mr. Muthu Sundram at (212) 637-3148.

We appreciate and look forward to your prompt response to this information request.

Sincerely yours,

Richard L. Caspe, Director
Emergency and Remedial Response Division

Attachments

Instructions For Responding To The Request For Information

1. Answer Every Question Completely. A separate response must be made to each of the Questions set forth in this Information Request. For each Question contained in this letter, if information responsive to this information request is not in your possession, custody, or control, please identify the person(s) from whom such information may be obtained.
2. Number Each Answer. Precede each answer with the corresponding number of the Question and the subpart to which it responds.
3. Provide the Best Information Available. In answering these Questions, every source of information to which you have access should be consulted, regardless of whether the source is in your immediate possession or control. Provide responses to the best of Respondent's ability, even if the information sought was never put down in writing or if the written documents are no longer available. You should seek out responsive information from current and former employees/agents. Submission of cursory responses when other responsive information is available to the Respondent will be considered non-compliance with this Information Request. If anything is omitted from a document produced in response to the "Request for Information," state the reason for and the subject matter of the omission.
4. Identify Sources of Answer. For each Question, identify (see Definitions) all the persons and documents you relied on in producing your answer. All documents or other information, including records of all types of manufacturing, treatment, transportation or disposal operations, in your possession or in the possession of your parent corporation, affiliates, subsidiaries, divisions, agents and consultants should be consulted. If you do not have access to certain information and/or documents, state the nature of this information and/or documents, and indicate in whose possession they can be found.

5. Continuing Obligation to Provide/Correct Information. If additional information or documents responsive to this Request becomes known or available to you after you respond to this Request, EPA hereby requires pursuant to CERCLA Section 104(e) that you supplement your response to EPA.
6. Confidential Information. The information requested herein must be provided even though you may contend that it includes confidential information or trade secrets. You may assert a confidentiality claim covering part or all of the information requested, pursuant to Sections 104(e) (7) (E) and (F) of CERCLA, U.S.C. §§ 9604(e)(7)(E) and (F), Section 3007 (b) of Resource Conservation and Recovery Act (RCRA), 42 U.S.C. §6927(b), and 40 C.F.R. §2.203(b).

If you make a claim of confidentiality for any of the information you submit to EPA, you must prove that claim. For each document or response that you claim to be confidential, you must separately address the following points:

- a. the portions of the information alleged to be entitled to confidential treatment;
- b. the period of time for which confidential treatment is desired (e.g., until a certain date, until the occurrence of a specific event, or permanently);
- c. measures taken by you to guard against the undesired disclosure of the information to others;
- d. the extent to which the information has been disclosed to others, and the precautions taken in connection there within;
- e. pertinent confidentiality determinations, if any, by EPA or other federal agencies, and a copy of any such determinations or reference to them, if available; and
- f. whether you assert that disclosure of the information would likely result in substantial harmful effects on your business' competitive position, and if so, what those harmful effects would be, why they should be viewed substantial, and an explanation of the causal

relationship between disclosure and such harmful effects.

To make a confidentiality claim, please stamp, or type, "confidential" on all confidential responses and any related confidential documents. Confidential portions of otherwise nonconfidential documents should be clearly identified. You should indicate a date, if any, after which the information need no longer be treated as confidential. Please submit your response so that all non-confidential information, including any redacted versions of documents are in one envelope and all materials for which you desire confidential treatment are in another envelope.

7. Disclosure to EPA Contractor. Information which you submit in response to this Information Request may be disclosed by EPA to authorized representatives of the United States, pursuant to 40 C.F.R. 2.310(h), even if you assert that all or part of it is confidential business information. Please be advised that EPA intends to disclose all responses to this Information Request to one or more of its private contractors for the purpose of organizing and/or analyzing the information contained in the responses to this Information Request. If you are submitting information which you assert is entitled to treatment as confidential business information, you may comment on this intended disclosure within fourteen (14) days of receiving this Information Request.
8. Personal Privacy Information. Personnel and medical files, and similar files the disclosure of which to the general public may constitute an invasion of privacy should be segregated from your responses, included on separate sheet(s), and marked as "Personal Privacy Information".
9. Objections to Questions. If you have objections to some or all the Questions contained in the Request for Information, you are still required to respond to the questions.

Definitions

The following definitions shall apply to the terms as they appear in this Information Request.

1. The term "you" or "Respondent" shall include any officers, managers, employees, contractors, trustees, successors, assignees, and agents as applicable.
2. The term "person" shall include any individual, firm, unincorporated association, partnership, corporation, trust, or other entity.
3. The terms "Cornell-Dubilier Electronics, Inc. Site" or the "Site" shall refer to approximately 25 acres of property currently known as Hamilton Industrial Park located 333 Hamilton Boulevard, South Plainfield, Middlesex County, New Jersey, and including, but not limited to, the parcel identified as Block 256, Lot 1 on the municipal tax map in the Borough of South Plainfield.
4. The term "hazardous substances" shall have the same definition as that contained in Section 101 (14) of CERCLA, and includes any mixtures of such hazardous substances with any other substances, products or other nonhazardous substances.
5. The terms "CERCLA waste material" or "industrial waste material" shall mean any solid, liquid or sludge or any mixtures thereof which possess any of the following characteristics:
 - a. it contains one or more "hazardous substances" (at any concentration) as defined in 42 U.S.C. §9601(14);
 - b. it is a "hazardous waste" as defined in 42 U.S.C. §6904;
 - c. it has a hydrogen ion concentration (pH) of less than 2.0 or greater than 12.5;
 - d. it reacts violently when mixed with water;
 - e. it generates toxic gases when mixed with water;

- f. it ignites or explodes;
 - g. it is an industrial intermediate waste product;
 - h. it is an industrial treatment plant sludge or supernatant;
 - i. it is coolant water or blowdown waste from a coolant system;
 - j. it is spent product which could be reused after rehabilitation; or
 - k. it is any material which you have reason to believe would be toxic if either ingested, inhaled or placed in contact with your skin.
6. The term "identify" means, with respect to a natural person, to set forth the person's name, present or last known employer and business address and business telephone number, present or last known home address and home telephone number, and present or last known job title, occupation, position or business.
7. With respect to a corporation, partnership, business trust or other association or business entity (including a sole proprietorship) the term "identify" means to provide its full name, address, and affiliation with the individual and/or company to whom/with this request is addressed.
8. The term "document" and "documents" shall include, but not be limited to, the following: "papers, books, records, letters, photographs, correspondence, communications, telegrams, cables, Telex message, memoranda, laboratory work papers, batch sheets, other work papers, ledger sheets, transcripts, minutes, reports and recordings of telephone or other conversations, or of interviews or of conferences, or of other meetings, affidavits, statements, summaries, opinions, reports, studies, drafts, analyses, bulletins, notices, announcements, advertisements, instructions, charts, manuals, brochures, publications, schedules, journals, statistical records, diaries, lists, logs, well logs, field logs, tabulations, sound recordings, computer printouts, computer-readable materials, chromatograms, spectrographs, mass spectra or spectrograms, data generated

from any physio-chemical methods of analyses, data processing input and invoices, checks, notes, diagrams, maps, graphs, or materials with handwriting or other printing on them and other tangible material". "Document" shall also include any data compilation from which information can be obtained or translated if necessary by you through detection devices into reasonably usable form.

9. The term "arrangement" means every separate contract or other agreement between two or more persons, whether written or oral.
10. The term "material" or "materials" shall mean any and all objects, goods, substances, or matter of any kind, including but not limited to wastes.
11. The term "real estate" shall mean and include, but not be limited to the following: land, buildings, houses, dwelling places, condominiums, cooperative apartments, offices or commercial buildings, including those located outside the United States.
12. The term "release" shall mean any spilling, leaking, pumping, pouring, emitting, emptying, discharging, injecting, escaping, leaching, dumping or disposing into the environment, and other closed receptacles containing any hazardous substance or pollutant or contaminant.
13. The term "pollutant or contaminant" shall include, but not be limited to, any element, substance, compound, or mixture, including disease-causing agents, which after release into the environment will or may reasonably be anticipated to cause death, disease, behavioral abnormalities, cancer, genetic mutation, physiological malfunctions (including malfunctions in reproduction) or physical deformations; except that the term "pollutant or contaminant" shall not include petroleum.
14. All terms not defined herein shall have their ordinary meaning, unless such terms are defined in CERCLA or RCRA, in which case the statutory definitions shall apply.

Request For Information

1.
 - a. State the legal name of your business.
 - b. State the name(s) and address(es) of the President or the Chairman of the Board, or other presiding officers of your business.
 - c. State the legal form of business (e.g., corporation, partnership, etc.). Identify the state and date of incorporation of your business and your business agent for service of process in the state of incorporation and in New Jersey State.
 - d. Provide a copy of your business "Certificate of Incorporation" and any amendments thereto.
 - e. If your business is a subsidiary or affiliate of another company, or has subsidiaries, or is a successor to another company, identify these related companies. For each related company, describe the relationship to your business and indicate the date and manner in which each relationship was established.
2. In identifying a business entity that no longer exists, provide all the information called for in Question 1, except for the agent for service of process. If a business entity conducted business under more than one name, designate each name.
3. Does the business entity identified in Question 1 above have a permit or permits issued pursuant to the Resource Conservation and Recovery Act, 42 U.S.C. §6901 et seq? Also, if any of the business entities identified in Question 1 above has/had an EPA Identification Number, state it in your answer to this Question.
4. Do you currently own, operate, lease, or maintain, or have you in the past, owned, operated, leased, or maintained any real property at the Site? Provide all relevant

documentation, including deeds, leases, or other materials which relate to such premises. Include the building(s) used, the dates of occupation, and the type of business conducted.

5. Provide a description of all past and present operations at the Site of each business entity identified in Question 1 above. Your description should include, but not be limited to, all manufacturing, research and development, processing and/or handling activities. For each type of operation described in the answer to this Question, provide the name(s), and job description(s) of the person or persons responsible for the management of that particular operations. If such person(s) are no longer employed by the company, provide their last known address(es).
6. Provide a detailed list of chemicals, including hazardous substances, hazardous wastes, process residuals and industrial wastes used, stored, generated or handled by your business. Describe the use for each of the chemicals at the Site. Estimate quantities used on an annual basis and include the sources of these chemicals at that time. Provide documents in support of your list.
7. Indicate if the business had any analyses performed as part of business practices or for any reason and provide analytical results of all hazardous substances, hazardous wastes and/or "CERCLA waste material" as defined in #5 of the Definitions) including, but not limited to mixtures, solvents, PCBs and sludge which were generated, purchased, used, disposed of and/or handled in any manner by the company, other companies or any other person(s) at the Site. This list should include chemical and physical composition and the amount of all specified materials generated, purchased, used and/or handled by the business on annual basis from the commencement of operations to the present.
8. Describe all storage and disposal practices employed by your company with respect to all hazardous substances, hazardous wastes and/or "CERCLA waste material" handled in any way in the operation of the business entity identified in Question 1 above from the time operations commenced until the

present. Include all on-site and off-site storage and disposal activities.

9. Provide a copy of each document which relates to the generation, purchase, use, handling, hauling, and/or disposal of all hazardous substances, hazardous wastes and/or "CERCLA waste material" identified in response to Questions 5, 6, 7, and 8 above. If you are unable to provide a copy of any document, then identify the document by describing the nature of the document (e.g. letter, file, memo, invoice, inventory form, billing record, hazardous waste manifest, etc.). Describe the relevant information contained therein. Identify by name and job title the person who prepared the document. If the document is not readily available, state where it is stored and why it is unavailable.
10. Have any leaks and/or spills of any hazardous substances, hazardous wastes and/or "CERCLA waste material" occurred at the Site? If so, provide the date(s), response action(s) taken, documents which relate to the response action(s), and the ultimate disposal of the hazardous substance, hazardous waste and/or "CERCLA waste material" resulting from those leaks and/or spills. If you are unable to provide a copy of any document, then identify the document by describing the nature of the document (e.g. letter, file, memo, invoice, workplan, memorandum of agreement, inventory form, billing record, hazardous waste manifest, etc.).
11. Identify each person (including company, individual, partnership, etc.) having knowledge of the facts relating to the generation and/or disposal of hazardous substances, hazardous waste and/or "CERCLA waste material" identified in response to Questions 5, 6, 7, 8, 9, and 10 above. For each person identified, provide the name, address and telephone number of that person and the basis of your belief that he or she has such knowledge.
12. Submit a copy of any lease, contract, permit or other written agreement relating to the generation, handling, transport and/or disposal of all hazardous substances, hazardous wastes and/or "CERCLA waste material" at the business entity identified in Question 1 above's facility.

If the documents are unavailable, refer to Question 9, above, for the specific information required.

13. State whether any agreements or contracts (other than an insurance policy) exist which may indemnify the business entity identified in Question 1 above, present owners of shares in the company or past owners of shares in the company, for any liability that may result under CERCLA for any release or threatened release of a hazardous substance at the Site. If such agreements or contracts exist, please provide a copy of the agreement or contract. Identify any agreement or contract that you are unable to locate or obtain. If the documents are unavailable, refer to Question 9, above, for the specific information required.
14. State whether an insurance policy has ever been in effect which may indemnify the business entity identified in Question 1 above against any liability which the business entity may have under CERCLA for any release or threatened release of a hazardous substance that may have occurred at the Site. If so, please provide a copy of the policy. Identify any policy that you cannot locate or obtain by the name of the carrier, years in effect, nature and extent of coverage, and any other information you have.
15. State whether any of the business entities identified in Question 1 above filed for bankruptcy and if so, provide the following information to the extent available to you:
 - a. The date of such filing;
 - b. The statutory provision under which a petition for bankruptcy was filed (Chapter 7, 11 or 13);
 - c. The court where the petition was filed;
 - d. The name, address and telephone number of the bankruptcy trustee;
 - e. The disposition of the petition and the date on which it was so disposed; and
 - f. Any other information relevant to aforesaid bankruptcy.

16. Please supply any additional information which may help EPA to identify sources who disposed of hazardous substances, hazardous wastes and/or "CERCLA waste material" at the Site.
17. Provide any and all other documents that indicate or show a business relationship(s) between business entities, other than the business identified in Question 1 above, and the Site.
18. State the name(s), address(es), telephone number(s), title(s) and occupation(s) of the person(s) answering this "Request for Information" and state whether such person(s) has personal knowledge of the answers.
19. Identify each person who assisted in any manner in responding to the "Request for Information" and specify the question for which each person provided assistance in responding.

CERTIFICATION OF ANSWERS TO REQUEST FOR INFORMATION

State of _____

County of _____

I certify under penalty of law that I have personally examined and am familiar with the Information submitted in this document (response to EPA Request for Information) and all documents submitted herewith, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete, and that all documents submitted herewith are complete and authentic unless otherwise indicated. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

NAME (print or type)

TITLE (print or type)

SIGNATURE

Sworn to before me this

day of _____, 1997

Notary Public

List of addresses:

Dana Corporation Foundation
Joseph A. Stancati
4500 Dorr Street
Toledo, Ohio 43615

Marco Investing Corp.
Anthony Coraci
70 Blanchard Street
Newark, New Jersey 07105

Allied Acid
Robert E. Riley
56 Horseneck Road
Faifield, New Jersey 07006

Heckel & Heckel Corporation
Richard Heckel
154 Lincoln Street
Berkeley Hts, New Jersey 07922

B & H Metal Products, Inc.
Michael Wood, Senior
84 Baekeland Avenue
Middlesex, New Jersey 08846

Galaxy Steel Door & Frame Co.
3470 Rand Road
South Plainfield, New Jersey 07080

Alloys & Metals
35 E. Main Street #6
Marlton, New Jersey 08053

M & B Die Co.
157 S. 10th Avenue
Manville, New Jersey 08835

M & B Die Co.
302 W. 37th Street
New York, New York 10018

Commercial Lift Truck Inc.
1820 Lee Road
Lithia Springs, Georgia 30057

Commercial Lift Truck Inc.
169 Lodi Street
Hackensack, New Jersey 07601

Forman Industries
3150 Bordentown Avenue
Old bridge, New Jersey 08857

Advanced Catalyst Systems, Inc.
Larry Campbell
11141 Outlet Dr.
Knoxville, TN 37932

Norpak Corporation
Anthony Coraci
70 Blanchard Street
Newark, New Jersey 07105

JRS Machine Shop
333 Hamilton Boulevard
South Plainfield, New Jersey 07080

Transport Logistics
333 Hamilton Boulevard
South Plainfield, New Jersey 07080

Promotional Associates, Inc.
333 Hamilton Boulevard
South Plainfield, New Jersey 07080

RupCoe Plumbing & Heating
333 Hamilton Boulevard
South Plainfield, New Jersey 07080

DSM Enterprises
333 Hamilton Boulevard
South Plainfield, New Jersey 07080

Hope International Records
American Video & Disc
333 Hamilton Boulevard
South Plainfield, New Jersey 07080

Pioneer Associates & Erectors, Inc.
333 Hamilton Boulevard
South Plainfield, New Jersey 07080

Divirsified Installations, Inc.
333 Hamilton Boulevard
South Plainfield, New Jersey 07080

Central Jersey Trading Co., LLC.
333 Hamilton Boulevard
South Plainfield, New Jersey 07080

R & M Manufacturing
333 Hamilton Boulevard
South Plainfield, New Jersey 07080

JRS Machine Shop
333 Hamilton Boulevard
South Plainfield, New Jersey 07080

Robalo Enterprises, Inc.
333 Hamilton Boulevard
South Plainfield, New Jersey 07080

Columbia Products, Inc.
333 Hamilton Boulevard
South Plainfield, New Jersey 07080

Able Metro Moving & Storage, Inc.
333 Hamilton Boulevard
South Plainfield, New Jersey 07080

Everlasting Floral Prod.
333 Hamilton Boulevard
South Plainfield, New Jersey 07080

Gundaker Fabrication
333 Hamilton Boulevard
South Plainfield, New Jersey 07080

Fabrication Tech.
333 Hamilton Boulevard
South Plainfield, New Jersey 07080

Stan's Lawn Service
333 Hamilton Boulevard
South Plainfield, New Jersey 07080